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March 29, 1999

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BY FAX AND FIRST CLASS MAIL

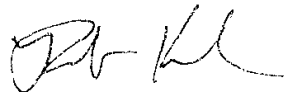
Seth H. Row  
Attorney  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 4728  
(Campaign for Working Families)

Dear Seth:

Your letter of March 23, 1999 requested additional information concerning reports filed by Campaign for Working Families and requested that we submit our response by April 2, 1999. I will be out of the office observing the Passover holiday and will therefore require additional time to prepare an adequate response. We intend to submit a response to your letter on or before April 9, 1999. If this is not acceptable to you, please let me know immediately so that we may file a formal extension request with the full Commission.

Sincerely,



Robert K. Kelner'

Admitted to the Bar of Maryland  
Not Admitted to the Bar of the District of Columbia

## AFFIDAVIT OF PETER DICKINSON

Peter Dickinson, being duly sworn, deposes and says:

1. I am Executive Director of Campaign for Working Families. I was personally involved in reporting independent expenditures made by CWF in support of Peter Roskam and Perry Atkinson.

2. The Commission has noted that there are discrepancies between the independent expenditure amounts reported in certain pre-election 24-hour reports and the amounts reported in post-election monthly reports. Specifically, the Commission has noted that although CWF reported independent expenditures of \$69,510 in support of Peter Roskam in its March 16, 1998 pre-election 24-hour report, CWF reported only \$10,625.70 in its post-election April 1998 monthly report. The Commission has also noted that although CWF reported independent expenditures of \$18,500 in support of Parry Atkinson in its May 7, 1998 24-hour pre-election report, CWF reported only \$12,083 in its post-election June 1998 monthly report. In both cases, the amounts reported in CWF's 24-hour reports represented CWF's best estimates of the anticipated costs of the independent expenditures (based on vendor estimates) at the time the reports were filed. This approach is consistent with Commission regulations governing reporting of "last-minute" independent expenditures. 11 C.F.R. § 104.4(b).

3. After the relevant elections, because the actual costs associated with mailings, media buys, and other independent expenditures may vary significantly from initial estimates, CWF reported the actual amounts disbursed in relation to the independent expenditures based upon bills received from vendors, as they came in. Some of those disbursements were reported on the first monthly reports after the relevant elections. Other bills came in later, and were reported on subsequent monthly reports. All actual costs related to the independent expenditures

that were the subject of 24-hour reports in March and May 1998 were ultimately reported to the Commission in subsequent monthly reports.

4. CWF correctly reported on Schedule E forms \$50,403 of independent expenditures in support of Peter Roskam that were listed on the March 16, 1998 24-hour report. Other independent expenditures of \$7,251.50 in support of Peter Roskam that were listed on the March 16, 1998 24-hour report were subsequently reported on Schedule B to CWF's March and April 1998 monthly reports. CWF will submit amendments moving these expenditures from Schedule B to Schedule E.

5. CWF correctly reported on Schedule E forms \$9,500 of independent expenditures in support of Perry Atkinson that were listed on the May 7, 1998 24-hour report. Other expenditures of \$9,509.47 in support of Peter Atkinson that were listed on the May 7, 1998 24-hour report were subsequently reported on Schedule B to CWF's October 1998 monthly report. CWF will submit amendments moving these expenditures from Schedule B to Schedule E.

6. It has come to CWF's attention that a \$25,002.55 disbursement to Brabendar Cox reported by CWF on the Schedule E accompanying its April 1998 monthly report indicated that the disbursement was in support of the campaign of Tom Bordonaro. The expenditure was instead related to the March radio spots in support of Peter Roskam. Because of a decision by one radio station not to run one of CWF's radio spots, only \$18,610 was actually used (the amount reported by CWF in its March 16, 1998 24-hour report). CWF will submit an amended Schedule E to its April 1998 monthly report.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



Peter Dickinson

SUBSCRIBED AND SWORN TO before me this  
8 day of March 1999.



Notary Public

LISA POWER KATES  
NOTARY PUBLIC, STATE OF CALIFORNIA

My Commission Expires:

My Commission Expires September 1, 2001